

STATE OF NEW YORK  
SUPREME COURT: COUNTY OF ERIE

---

OF DOE 1,

Plaintiff,

vs.

**SUMMONS served with**  
**COMPLAINT**

**Index No.:**

WEST SENECA CENTRAL SCHOOL DISTRICT  
675 POTTERS ROAD  
WEST SENECA, NEW YORK 14225

Defendant.

---

TO THE ABOVE-NAMED DEFENDANT:

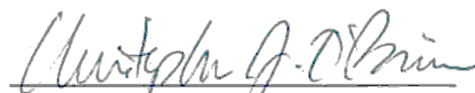
YOU ARE HEREBY SUMMONED AND REQUIRED to serve upon the plaintiff's attorneys, at the address stated below, a written Answer to the attached Verified Complaint.

If this Summons is served upon you within the State of New York by personal service you must respond within twenty (20) days after service, not counting the day of service. If this Summons is not personally delivered to you within the State of New York, you must respond within thirty (30) days after service is complete, as provided by law.

If you do not respond to the attached Verified Complaint with the applicable time limitation stated above a Judgment will be entered against you, by default for the relief demanded in the Verified Complaint, without further notice to you.

This action is brought in the County of Erie because of plaintiff's residence.

DATED: Amherst, New York  
August 26, 2019

A handwritten signature in blue ink, reading "Christopher J. O'Brien", is written over a horizontal line.

Christopher J. O'Brien, Esq.  
O'BRIEN & FORD, P.C.  
*Attorneys for Plaintiffs*  
4925 Main Street  
Amherst, New York 14226  
(716)907-7777

STATE OF NEW YORK  
SUPREME COURT: COUNTY OF ERIE

---

OF DOE 1,

Plaintiff,

vs.

**COMPLAINT**

**Index No.**

WEST SENECA CENTRAL SCHOOL DISTRICT,

Defendant.

---

Plaintiff OF Doe 1, by and through his attorneys, O'BRIEN & FORD, P.C., hereby complains of the defendant and alleges:

1. At all times hereinafter referenced, plaintiff was and is a resident of the County of Erie and State of New York. This filing under the OF Doe 1 pseudonym is pursuant to local court rules.

2. Upon information and belief and at all times hereinafter referenced, Defendant West Seneca Central School District was and is a school district located in the County of Erie and State of New York.

3. Upon information and belief and at all times hereinafter referenced, the premises known as the West Seneca East High School, was and is a public school, owned, controlled, supervised, operated and managed by the West Seneca Central School District.

4. During the Fall of 1999 and through June of 2000, OF Doe 1 was a student and was legally and lawfully upon the premises of West Seneca East High School.

5. During the aforementioned time period, the Infant Plaintiff suffered injury on the defendant's grounds when he was groomed, sexually assaulted, abused and/or sodomized by an employee of the defendant, Anthony Harper. Said actions took place while Anthony Harper was under the supervision and in the employ of the West Seneca Central School District.


6. As a result of the foregoing, Plaintiff OF Doe 1 sustained pain, suffering and emotional, mental and psychological injuries inflicted upon him by Anthony Harper.

7. Upon information and belief, Plaintiff OF Doe 1 sustained injuries due to the negligence, carelessness, lack of supervision and lack of appropriate policies of the West Seneca Central School District.

8. As a result of the negligence of the defendant in the first cause of action, the plaintiff has suffered damages in an amount that exceeds the jurisdictional level of all lower courts.

**WHEREFORE**, Plaintiffs seek judgment against the Defendant in an amount which exceeds the jurisdictional limits of all Courts of lower jurisdiction, together with the costs and disbursements of this action and for such other and further relief as the Court deems just and proper.

DATED: Amherst, New York  
August 26, 2019

  
Christopher J. O'Brien, Esq.  
O'BRIEN & FORD, P.C.  
Attorneys for the Plaintiff  
4925 Main Street  
Amherst, New York 14226  
(716)907-7777